

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Southwestern Electric Power Company (SWEPCO)	AI #: 584	TEMPO Activity No:
Facility Name:	Lieberman Power Plant	Remarks Submitted by:	Kimberly Hughes
Permit Writer:	Shane Clary	Permit Writer Email address:	Shane.Clary@la.gov

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Cover Letter	Correct Mailing Address to: 11730 Hwy 538, Mooringsport, LA 71060	Change made.
Cover Letter	Include “Renewal” after “RE: Part 70 Operating Permit”	Change made.
Cover Letter	Update body of letter to better reflect that this is a renewal of existing equipment and not for new construction.	No change will be made. The language is standard for all Title V permits.
Table 1	Change designations under Chapter 15 for ID Nos: 01, 02, 03, 04 and DFP to “2”.	The designations have been changed to “3”.
Table 1	Change the designation under ZZZZ to “3”. Subpart ZZZZ does not apply to the DFP because the site is not a major source of HAPs. Only Subpart IIII applies to the DFP.	No change will be made. The site is considered an area source of HAPs.
Table 2	Add DFP for non-applicability to Subpart ZZZZ – The Lieberman site is not a major source of HAP emissions.	No change will be made. The site is considered an area source of HAPs.
LA General Condition III	Remove the references to Table 2 and 3. The reference to Table 2 is not appropriate and there is no Table 3.	Change made.

LA General Condition VII	Remove the references to Table 2, 3, 4, and 5. The reference to Table 2 is not appropriate and there is no Table 3, 4 or 5.	Change made.
LA General Condition XVII	Clarify "Activities List". Is this what is described in the Air Permit Briefing Sheet Condition IX?	No. General Condition XVII refers to VIII in the Briefing Sheet.
Specific Requirements – EQT 0003	Remove condition 8 under EQT 0003. 20% opacity limit is already covered under LAC 33:III.1101.B.	No change will be made. The opacity limitation covered under LAC 33:III.1311.C, Condition 8, is applicable as well.
Specific Requirements – EQT 0004	Remove condition 18 under EQT 0004. 20% opacity limit is already covered under LAC 33:III.1101.B.	No change will be made. The opacity limitation covered under LAC 33:III.1311.C, Condition 18, is applicable as well.
Specific Requirements – EQT 0008	For clarity purposes, add 'Common' in the description. So that it would read "01-02 – Boiler Units 1, 2 Common Stack". This would also need to be changed wherever else it is referenced in the permit.	Change made.
Specific Requirements – EQT 0008	Remove condition 24 under EQT 0008. 20% opacity limit is already covered under LAC 33:III.1101.B.	No change will be made. The opacity limitation covered under LAC 33:III.1311.C, Condition 24, is applicable as well.
Specific Requirements – EQT 0009	Remove condition 34 under EQT 0009. Subpart ZZZZ is not applicable. The Lieberman site is not a major source of HAP emissions.	No change will be made. The site is considered an area source of HAPs
Specific Requirements – EQT 0009	Remove condition 36 under EQT 0009. 20% opacity limit is already covered under LAC 33:III.1101.B.	No change will be made. The opacity limitation covered under LAC 33:III.1311.C, Condition 36, is applicable as well.
Specific Requirements – SCN 0001	Remove condition 39 under SCN 0001. 20% opacity limit is already covered under LAC 33:III.1101.B.	No change will be made. The opacity limitation covered under LAC 33:III.1311.C, Condition 39, is applicable as well.
Specific Requirements – SCN 0001	Better clarify condition 44 under SCN 0001. Is the first listed testing (CO) only required when fuel oil is burn for 60 consecutive days? Does the testing have to be performed within a time period of firing fuel oil or while firing fuel oil? How do the other emissions testing play into fuel oil firing...do they also have to be performed if firing fuel oil for 60 consecutive days?	The following changes have been made to better clarify stack testing for the boilers: The stack testing requirements have been moved from EQTs 3 & 4 to SCNs 5 & 6 (alternate scenarios for burning natural gas), respectively; the requirements for stack testing SO ₂ , NO _x and organics have been removed from the permit; and, stack testing for PM ₁₀ is required along with stack testing for CO.
Specific Requirements – EQT 0003, EQT 0004, SCN 0001 & SCN 002	Why is emission testing for CO, SO ₂ , NO _x , PM and organics being required? Is this a new requirement and is this requirement apart of other similar unit's Title V permits?	The emission testing requirements for SO ₂ , NO _x and organics have been removed. Emission testing for PM ₁₀ is required for facilities emitting 25 tpy or more of PM ₁₀ .
Specific Requirements – UNF 0001	For clarity purposes, change "Entire Facility - Southwestern Electric" to "Entire Facility - Lieberman Power Plant". This would also need to be changed wherever else it is referenced in the permit.	Change made.
Emission Rates for TAP/HAP & Other Pollutants	Remove the Avg and Max lb/hr limits and just list Tons/Year rates (as it is with the Temporary Variances). Also remove those pollutants that have less than 0.001 limits listed (Barium, Cadmium, and Lead). So the rates listed under Tons/Year would not change.	No change will be made. The average and maximum lb/hr limits are necessary for screening/modeling purposes. Also, the rates listed under Tons/Year are not affected by the pollutants that have less than 0.001 limits listed.
Inventories	Remove the listed rates under "Max. Operating Rate"	Change made.

	<p>and place under "Normal Operating Rate".</p> <ul style="list-style-type: none">- Add 'Fuel Oil' under "Contents" for EQT 0005 and EQT 0006.- Delete the listed operating rate for EQT0008 (it is a common stack and not a boiler). Also add 'Common' (before 'Stack') to the Description as described earlier.	
General Information	<p>There are a few things on this sheet that need to be corrected. Should I state those correction here or send an email to Mr. David Ferrand, as listed under "Note".</p>	<p>Send an email to Mr. David Ferrand.</p>